

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division

JOANN WRIGHT HAYSBERT

Plaintiff,

V.

BLOOMIN' BRANDS, INC.,
and
OUTBACK STEAKHOUSE OF
FLORIDA, LLC,

Defendants.

Case No.: 4:20-cv-00121-RBS-DEM

MOTION TO AMEND/CORRECT

Defendants, Bloomin' Brands, Inc. ("Bloomin' Brands") and Outback Steakhouse of Florida, LLC ("Outback"), by counsel, respectfully request that paragraph 4 of the Notice of Removal be corrected to state:

“4. At the time this action was commenced in the Circuit Court of the City of Hampton and at the time of the filing of this Notice of Removal, Bloomin’ Brands was and remains a corporation organized and existing under the laws of Delaware with its principal place of business in Tampa, Florida. Additionally, at the time this action was commenced in the Circuit Court of Hampton and at the time of filing this Notice of Removal, Outback Steakhouse of Florida, LLC, was and remains a corporate organized an existing under the laws of Florida with its principal place of business in Tampa, Florida.”

Attached hereto as exhibit A is a corrected Notice of Removal.

Accordingly, Defendants respectfully request that the Notice to Remove be corrected to accurately reflect that Outback Steakhouse of Florida, LLC was organized and exists under the law of Florida.

BLOOMIN' BRANDS, INC.
and
OUTBACK STEAKHOUSE
OF FLORIDA, LLC
By Counsel

/s/ John D. McGavin
John D. McGavin, VSB No. 21794
jmcgavin@bmhjlaw.com
Anna G. Zick VSB No. 86057
azick@bmhjlaw.com
BANCROFT, MCGAVIN, HORVATH & JUDKINS, P.C.
9990 Fairfax Blvd. Suite 400
Fairfax, Virginia 22030
(703)385-1000 Telephone
(703)385-1555 Facsimile
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2020, a true and accurate copy of the foregoing Notice of Filing a Notice of Removal was sent via mail and email to:

Stephen Teague, Esq.
Virginia State Bar No. 81006
Law Office of Stephen C. Teague
P.O. Box 706,
Newport News, VA 23607
contact@teaguelawoffice.com
Telephone: (757) 317-0716
Facsimile: (757) 215-2974

Nazareth M. Haysbert, Esq.
California State Bar No. 294431
James L. Moultrie III, Esq.
California State Bar No. 296805
Haysbert Moultrie, LLP
4640 Admiralty Way, Suite 500
Marina Del Rey, California 90292
nazareth@hmlaw.la
james@hmlaw.la
Telephone: (310) 496-5796
Facsimile: (310) 760-4083

Counsel for Plaintiff

John D. McGavin /s/
John D. McGavin, VSB No. 21794
jmcgavin@bmhlaw.com
BANCROFT, McGAVIN,
HORVATH & JUDKINS, P.C.
9990 Fairfax Blvd. Suite 400
Fairfax, Virginia 22030
(703)385-1000 Telephone
(703)385-1555 Facsimile
Counsel for Defendant